

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :
: Case No.: 1:18-CR-00094-WES-LDA-1
V. :
: STEVEN PAPAZIAN :

MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant, Steven Papazian, by and through counsel, hereby petitions this Honorable Court to modify the terms and conditions of his pretrial release by extending his curfew from 8:00 PM to 12:00 AM on Christmas Eve, December 24, 2018. As grounds, the defendant avers the following:

1. Mr. Papazian is charged by way of Indictment with (1) Possession and Receipt of Child Pornography, in violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2); and (2) Receipt of Child Pornography, in violation of 18 U.S.C. § 2252(a)(2) and (b)(1).
2. He is currently on pretrial release with conditions that include, but are not limited to a curfew requiring him to be at home between the hours of 8:00 PM and 6:00 AM.
3. He seeks an extension of the curfew on Christmas Eve so that he may celebrate this holiday with his family members.
4. If approved for the curfew extension, Mr. Papazian will attend a celebration from 7:00 P.M. to 12:00 A.M. at his uncle's home, located at 129 Wood Cove Drive, Coventry, RI 02816. In attendance will be Mr. Papazian's family members (immediate and extended).
5. Mr. Papazian is in full compliance with all terms and conditions of his release.
6. Based on the foregoing, Mr. Papazian asks that this motion be allowed.

Respectfully submitted this 20th day of December 2018.

Respectfully submitted
Defendant,
Steven Papazian
By his Counsel

/s/ John L. Calcagni III, Esq.
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CERTIFICATION

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on December 20, 2018.

/s/ John L. Calcagni III, Esq.
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